

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA	:	CRIMINAL NO. 1-05-0137(3 & 5)
	:	
	:	JUDGE BARRETT
v.	:	
	:	
	:	
GINO FREEMAN	:	GOVERNMENT'S MOTION TO STAY
RANDY MARTIN	:	<u>DEFENDANTS' PRESENTENCE REPORTS</u>

- - - - -

On April 30 and May 7, 2007, the defendants entered guilty pleas to Count 1 of the Third Superseding Indictment with the Court. At this time, the United States respectfully requests that this Court stay the defendants' Presentence Investigation Reports ("PSR") until the matters involving the last co-defendant, Jeffrey Pitts, are fully addressed. We believe that such an action will further the interests of justice.

Respectfully submitted,

DATE 5/23/07

s/Kenneth L. Parker  
KENNETH L. PARKER (0068805)  
Assistant United States Attorney  
221 East Fourth Street, Ste. 400  
Cincinnati, Ohio 45202  
(513) 684-3711

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Government's Motion To Stay The Defendants' Presentence Reports was served this 23<sup>rd</sup> day of May 2007, electronically on Kevin T. Bobo, William P. Whalen, and Bryan R. Perkins, Attorneys for Defendants Gino Freeman and Randy Martin.

s/Kenneth L. Parker  
KENNETH L. PARKER (0068805)  
Assistant United States

Attorney